

EXHIBIT A

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION

CASE NO. 14-23208-CIV-LENARD/GOODMAN

FLAVA WORKS, INC.
Plaintiff.

vs.

A4A RESEAU, INC. et al.,
Defendants.

FILED BY	PG	D.C.
DEC 18 2020		
ANGELA E. NOBLE CLERK U.S. DIST. CT. S. D. OF FLA. - MIAMI		

SWORN AFFIDAVIT

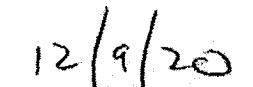
BEFORE ME, the undersigned officer duly licensed to take acknowledgments, appeared the undersigned affiant, Phillip Bleicher, who after being sworn, deposes and says:

1. This statement is being made to comply with the Court's Notice to Appear dated October 22, 2020.
2. The underlying issue is a judgment of \$81,958.72 in attorney's fees, costs and post judgment interest.
3. Additionally, there was a Clerk-issued Writ of Execution indicating various intellectual property and copyrights in the name of Flava Works, Inc. and myself, Phillip Bleicher, which would be used to satisfy the judgment to which I protest.
4. I understand, accept and respect the underlying ruling by the Court.
5. I also believe the amount in attorney's fees stacked against myself and Flava Works, Inc. in this case are excessive, egregious and were based solely as a personal vendetta against us.
6. There has been no clear disclosure of timesheets or record keeping to verify or substantiate a heavy majority of the fees claimed by counsel, John Bradley, just heavily redacted documents claiming to be hours spent trying to secure legal fees that are almost three times the initial fee.
7. I have been through multiple counsels and have paid more than \$35,000.00 in legal fees in relation to this case.
8. Further, it is only recently that I have actually been receiving any notices of filing on this case. I stopped receiving notice since the Spring 2019 and had no actual knowledge the case was moving forward. This was because Attorney Shambee misled me into believing she was handling the case, while actually petitioning the court to withdraw.
9. With regards to excessiveness of attorneys fees: I have discovered the following support: a) A claim for excessive hours is subject to a reduction by the court, *Florida Patient's Compensation Fund v. Rowe*, 472 So.2d 1145, 1150 (Fla.1985); and even recently Florida's Third District Court of Appeal rejected attorney fees of about \$442,000 in a

home insurance case with a \$25,000 settlement, calling the request "excessive and unsupported by the evidence."

10. I therefore, humbly request a clear detailed accounting of all time that opposing counsel is claiming he spent working on this case.
11. I have engaged in good faith negotiations to enter a payment plan of sorts and I am still amenable to that solution.
12. Defendants, meanwhile, have wholeheartedly rejected any settlement negotiations and have never proffered a counteroffer. The Honorable Judge even saying in open court that their aggressive behavior on the collection of the judgement appeared as if someone had a personal grudge - making this comment on November 20, 2015.
13. In light of this, and in the interest of judicial economy, it is my hope that the Court order the parties to mediation or some other type of alternative dispute resolution so that we can finally resolve our issues.
14. On December 3, 2020, I retained counsel to assist me in the settlement of this matter.
15. To preserve what capital I have remaining after all previous legal payments on behalf of Plaintiffs and to the adverse parties, counsel has agreed to a nominal fee to provide some guidance to see this case through.


Phillip Bleicher (signature)

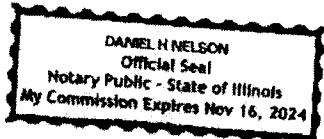

Date


Phillip Bleicher (print)

STATE OF ILLINOIS
COUNTY OF COOK

The foregoing instrument was acknowledged before me DANIEL NELSON, on the 09 day of December, 2020, by _____.

(SEAL)



A handwritten signature of Daniel N. Nelson in black ink.

Signature of Notary Public

A handwritten printed name, likely a signature, of Daniel N. Nelson.

Printed name of Notary Public



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